

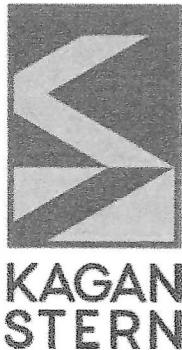
Exhibit A

From: [Stephen Stern](#)
To: [Gregory Jordan](#); [Thomas J. Gagliardo](#)
Cc: [Heather Yeung](#)
Subject: Boshea v. Compass Marketing, Inc. - Compass Marketing's Expert Disclosure
Date: Monday, September 13, 2021 4:09:39 PM
Attachments: [image001.png](#)
[Compass Marketing Expert Disclosure \(00151419xEC90E\).pdf](#)
[CV - Curt Baggett - 2021 \(00151424xEC90E\).pdf](#)

Greg and Tom:

Attached please find Compass Marketing's expert disclosure.

Stephen



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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

DAVID J. BOSHEA

Plaintiff,

v.

COMPASS MARKETING, INC.

Defendant.

Case No. 1:21-CV-00309-ELH

* * * * *

DEFENDANT COMPASS MARKETING, INC.'S EXPERT DISCLOSURE

Defendant Compass Marketing, Inc. ("Compass Marketing"), by and through its undersigned counsel and pursuant to Rule 26(a)(2)(C) as well as this Court's Scheduling Order [Dkt. No. 20], hereby makes the following Expert Disclosure.

1. Subject Matter on Which the Expert Witness is Expected to Present Evidence.

Compass Marketing has retained Curt Baggett, an expert document examiner, to provide an opinion as to whether the Compass Marketing, Inc. Agreement Relating to Employment and Post-Employment Competition (the "Alleged Agreement") upon which Plaintiff David Boshea relies in bringing this lawsuit and which is attached to the Original Complaint for Breach of Contract (the "Original Complaint") and Amended Complaint for Breach of Contract (the "Amended Complaint") as Exhibit A was signed by John White, Compass Marketing's CEO. A copy of Mr. Baggett's CV is attached hereto and provided with this Expert Disclosure.

2. Summary of Facts and Opinions the Expert is Expected to Testify About. Compass Marketing expects that Mr. Baggett will share an opinion, based on his analysis, that concludes

John White did not sign the Alleged Agreement and that the signature purporting to be John White's signature is indeed a forgery.

Dated: September 13, 2021

Respectfully submitted,

/s/ Stephen B. Stern

Stephen B. Stern, Bar No.: 25335

Heather K. Yeung, Bar No.: 20050

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Counsel for Defendant

Compass Marketing, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of September, 2021, the foregoing Defendant
Compass Marketing, Inc.'s Expert Disclosure was served on the following via email:

Thomas J. Gagliardo
Gilbert Employment Law, PC
1100 Wayne Avenue, Suite 900
Silver Spring, MD 20910
Email: tgagliardo@gelawyer.com

Gregory J. Jordan
Mark Zito
Jordan & Zito, LLC
350 N. LaSalle Drive, Suite 1100
Chicago, Illinois 60654
Email: gjordan@jz-llc.com

Attorneys for Plaintiff David Boshea

/s/ Stephen B. Stern

Stephen B. Stern

Forensic Document Examination Application by Robert Baier, QDE, Police Instructor
Trainer and Instructor for Introduction to Forensic Document Examination

2010 Handwriting University Annual Conference, Las Vegas, Nevada

Advanced Statement Analysis by Faith Wood

Identity Theft and Prevention by Robert Baier, QDE, Police Instructor

Trainer and Instructor for Introduction to Forensic Document Examination

2010 Speaker – “Introduction to the Science of Handwriting and Forensic Document Examination”, Clear Lake High School

2011 Lecturer and Instructor, “How to Spot a Forgery”, Denver Elections Division, Denver, Colorado

2012 Lecturer and Instructor, “How to Spot a Forgery”, Denver Elections Division, Denver, Colorado

2012 Speaker – “How to Avoid a Forgery”, Military Order of Purple Hearts Annual Meeting, Dallas, Texas

2013 Speaker – “Introduction to the Science of Handwriting and Forensic Document Examination”;
Appointment as Guest Lecturer and Consultant by Stefanie Page, Instructor, Forensic Science Department, Jesuit College Preparatory School of Dallas

2013 Speaker – “Introduction to the Science of Handwriting and Forensic Document Examination”, Irma Lerma Rangel Young Women’s Leadership School, Dallas, Texas

2016 Speaker – Handwriting University International Handwriting Conference in Las Vegas, NV (Sept.)

2018 Instructor via written presentation at the 18th Wroclaw Symposium of Questioned Document Examination at University of Wroclaw in Poland June 6-8, 2018

Past and Present Memberships

American College of Forensic Examiners International

American Legion

Center of Forensic Profiling

Forensic Expert Witness Association

IMS Expert Services

Military Order of World Wars

National Questioned Document Association

Sheriff’s Association of Texas

Texas Police Association

Veterans of Foreign Wars

World Federation of Handwriting Experts

National Association of Distinguished Professionals

SEAK-Expert Witness Resources

Published Articles and Books

Ethics for Experts

Handwriting Certification Course

How to Help Attorneys With Your Case

How to Spot a Forgery

Taking the Witness Stand